

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

UNITED STATES OF AMERICA

V.

CAUSE NO. 3:14CR111HTW-FKB

SAM WAGGONER

MOTION FOR MORE TIME TO RESPOND TO SUBPOENA

COMES NOW, your defendant, Sam Waggoner in his capacity as an officer of Correctional Communications, Inc., by and through the undersigned counsel and files this his Motion for More Time to Respond to Subpoena in the above styled and referenced cause and as grounds in support of same would respectfully state unto this Honorable Court the following to wit:

1.

The case is currently scheduled for an evidentiary hearing on June 9, 2016.

2.

The United State Attorney requested and received a subpoena issued to Correctional Communications, Inc. (CCI) on or about April 18, 2016.

3.

The subpoena requested the appearance of CCI and the production of certain documents.

4.

Your defendant's counsel received said subpoena on May 23, 2016 via email from the Federal Bureau of Investigation.

5.

If your Defendant has access to these documents, they would be in the possession of his personal accountant. Defendant submits that his personal accountant is on vacation and unavailable until June 13, 2016.

6.

Therefore, your defendant requests an additional thirty (30) days to respond to the subpoena.

WHEREFORE, PREMISES CONSIDERED your defendant, Sam Waggoner, by and through undersigned counsel respectfully requests that his Motion for More Time to Respond to Subpoena be received and considered by this Honorable Court and after same and Order issue granting Motion for More Time to Respond to Subpoena.

Respectfully Submitted

SAM WAGGONER,

BY: /s/ Nicholas R. Bain
NICHOLAS R. BAIN,
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Nicholas R. Bain, hereby certify that on June 7, 2016 I did electronically file the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the United States Attorney Office.

This the 7th of June, 2016.

/s/ Nicholas R. Bain